

AMY EDWARDS (OSB No. 012492)
amy.edwards@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
Telephone: 503.224.3380
Facsimile: 503.220.2480

BRYAN T. GLOVER, *Admitted Pro Hac Vice*
bryan.glover@stoel.com
STOEL RIVES LLP
600 University Street, Suite 3600
Seattle, WA 98101
Telephone: 206.624.0900
Facsimile: 206.386.7500

Attorneys for Creditor
Lake Oswego Corporation

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Blue Moon Property Group, LLC,
Debtor-in-Possession.

Case No. 22-31873-thp11

**UNOPPOSED MOTION FOR AN
ORDER EXTENDING LAKE OSWEGO
CORPORATION'S DEADLINE TO
FILE A SUPPLEMENTAL
DECLARATION SUPPORTING ITS
PROOF OF CLAIM**

Pursuant to Oregon Local Rules of Bankruptcy Procedure 7007-1 and 9013-1, Lake Oswego Corporation (“**LOC**”), through its undersigned counsel, hereby moves this Court for an order extending its deadline to file a supplemental declaration supporting its proof of claim (the “**Motion**”) in the bankruptcy case of the above-captioned debtor (“**Debtor**”). LOC conferred with

the Debtor regarding the Motion and hereby represents that the Debtor does not oppose the relief sought in this Motion.

In support thereof, LOC states as follows:

1. On March 31, 2023, the Debtor filed its objection to LOC's claim (the "***Claim Objection***"). [Dkt. #63].
2. On July 12, 2023, the court issued a partial oral ruling and set a deadline of July 28, 2023, for LOC to file a supplemental declaration regarding the current amount due with respect to its proof of claim.
3. LOC seeks an order extending the deadline by which LOC must file its supporting declaration through and including August 2, 2023. The brief extension is warranted because the parties are discussing whether a consensual resolution of the amounts owed may be reached and Debtor has agreed to this extension.

For the reasons stated herein, LOC submits there is good cause for granting the relief requested in the Motion and respectfully requests that the Court enter an order substantially in the form attached hereto as **Exhibit A**.

DATED: July 27, 2023.

STOEL RIVES LLP

/s/ Bryan T. Glover

Amy Edwards, OSB No. 012492

Bryan T. Glover, WSBA No. 51045

(*Admitted Pro Hac Vice*)

Email: amy.edwards@stoel.com

bryan.glover@stoel.com

Attorneys for Creditor

Lake Oswego Corporation

EXHIBIT A

(Proposed Form of Order)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

Blue Moon Property Group, LLC,
Debtor-in-Possession.

Case No. 22-31873-thp11

**ORDER GRANTING UNOPPOSED
MOTION FOR AN ORDER
EXTENDING LAKE OSWEGO
CORPORATION'S DEADLINE TO FILE
A SUPPLEMENTAL DECLARATION
SUPPORTING ITS PROOF OF CLAIM**

THIS MATTER having come before the Court upon the Unopposed Motion for an Order Extending Lake Oswego Corporation's Deadline to File a Supplemental Declaration Supporting its Proof of Claim [ECF No. ____] (the "***Motion***"), and the Court being duly advised in the premises and finding good cause; now therefore;

IT IS HEREBY ORDERED that LOC's deadline to file its supplemental declaration regarding the current amount due with respect to its proof of claim is extended through and including August 2, 2023.

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I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

STOEL RIVES LLP

/s/ Bryan T. Glover
Amy Edwards, OSB No. 012492
Bryan T. Glover, WSBA 51045
(*Admitted Pro Hac Vice*)
760 S.W. Ninth Avenue, Suite 3000
Portland, Oregon 97205
Telephone: (503) 224-3380
Facsimile: (503) 220-2480
Attorneys for Lake Oswego Corporation

cc: List of Interested Parties

List of Interested Parties

ECF Participants:

- **JESSE A BAKER** ecforb@aldridgepite.com,
JPB@ecf.inforuptcy.com;jbaker@aldridgepite.com
- **CHRISTOPHER N COYLE** chris@vbcattorneys.com, ecfmail@vbcattorneys.com
- **AMY EDWARDS** amy.edwards@stoel.com,
cherie.ferreira@stoel.com;docketclerk@stoel.com
- **BRYAN T. GLOVER** bryan.glover@stoel.com,
docketclerk@stoel.com,michelle.smock@stoel.com,jeannie.lihs@stoel.com
- **AMY E MITCHELL** mitchelltrustee@comcast.net, OR21@ecfcbis.com
- **DOUGLAS R RICKS** ecfmail@vbcattorneys.com,
doug@vbcattorneys.com;sara@vbcattorneys.com;ecfmail@vbcattorneys.com
- **TROY SEXTON** tsexton@portlaw.com, nhenderson@portlaw.com,troy-sexton-
4772@ecf.pacerpro.com,skuger@portlaw.com,courtnotices@portlaw.com
- **US TRUSTEE, PORTLAND** USTPRegion18.PL.ECF@usdoj.gov

CERTIFICATE OF SERVICE

I certify that on the date below, I caused to be electronically filed UNOPPOSED MOTION FOR AN ORDER EXTENDING LAKE OSWEGO CORPORATION'S DEADLINE TO FILE A SUPPLEMENTAL DECLARATION SUPPORTING ITS PROOF OF CLAIM with the Clerk of Court using the CM/ECF system, which will in turn automatically generate a Notice of Electronic Filing to all parties in the case who are registered users of the CM/ECF system.

I further certify that on the date below, I served a copy of the above-referenced document on Douglas Ricks at Vanden Bos & Chapman LLP, via email address doug@vbcattorneys.com.

DATED: July 27, 2023.

/s/ Jeannie Lihs

Jeannie Lihs, Paralegal